

MARK J. BOURASSA, ESQ. (NBN 7999)  
JENNIFER A. FORNETTI, ESQ. (NBN 7644)  
VALERIE S. CHRISTIAN, ESQ. (NBN 14716)

**THE BOURASSA LAW GROUP**

2350 W. Charleston Blvd., Suite 100

Las Vegas, Nevada 89102

Telephone: (702) 851-2180

Facsimile: (702) 851-2189

Email: *mbourassa@blgwins.com*

*jfornetti@blgwins.com*

*vchristian@blgwins.com*

NICHOLAS A. COLELLA (*pro hac vice*)

**LYNCH CARPENTER LLP**

1133 Penn Avenue, 5<sup>th</sup> Floor

Pittsburgh, Pennsylvania 15222

Telephone: (412) 322-9243

Email: *nickc@lcllp.com*

[Additional Counsel in Signature Block]

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

IN RE HANKINS PLASTIC SURGERY  
ASSOCIATES, P. C. dba HANKINS & SOHN  
PLASTIC SURGERY ASSOCIATES

Case No.: 2:23-cv-00824-RFB-DJA

**STIPULATION AND ORDER TO STAY  
DISCOVERY**

This Document Relates to: All Actions

Plaintiffs Jennifer Tausinga, Alysia Wrenn, Sarah Jefferson, and Caroline Aurora (collectively “Plaintiffs”) on behalf of themselves and all other similarly situated, by and through co-interim counsel of record, Jennifer A. Fornetti of The Bourassa Law Group and Nicholas A. Colella of Lynch Carpenter LLP and Plaintiffs’ steering committee, Raina Borrelli of Strauss Borrelli PLLC, Ramzy Ladah of Ladah Law Firm, and additional Plaintiffs’ counsel Clark Seegmiller and Jonathan B. Lee of Richard Harris Law Firm, and Defendant Hankins & Sohn Plastic Surgery Associates, P.C. dba Hankins & Sohn Plastic Surgery Associates (“Defendant”)

by and through its counsel of record, SCHNITZER JOHNSON & WATSON, CHTD., and co-counsel MCBRIDE HALL, hereby stipulate to stay all discovery deadlines and hearings for sixty (60) days to allow the parties to explore resolution of the action, as follows:

1. The Parties are in the process of scheduling mediation to explore resolution of this action. The parties are requesting a brief sixty (60) day stay on all upcoming hearings and deadlines. This includes the following hearings and deadlines that are scheduled before this court:

- Hearing on Motion to Compel scheduled for April 22, 2025 at 2:00 p.m.;
- Hearing on Motion to Dismiss scheduled for May 15, 2025 at 10:45 a.m.;
- Interim Fact Discovery Deadline scheduled for June 12, 2025; and
- Amendment and Joinder Deadline scheduled for June 12, 2025.

2. The parties agree to file a status report with the court by the end of the sixty (60) day stay.

**IT IS SO STIPULATED.**

Dated: April 21, 2025

Dated: April 21, 2025

/s/ Jennifer A. Fornetti

/s/ L. Renee Green

Mark J. Bourassa, Esq. (NBN 7999)  
Jennifer A. Fornetti, Esq. (NBN 7644)  
Valerie S. Christian, Esq. (NBN 14716)  
THE BOURASSA LAW GROUP  
2350 W Charleston Blvd, Suite 100  
Las Vegas, Nevada 89102  
mbourassa@blgwins.com  
jfornetti@blgwins.com  
vchristian@blgwins.com

L. Renee Green, Esq. (NBN 12755)  
Gary E. Schnitzer, Esq. (NBN 395)  
SCHNITZER JOHNSON & WATSON, CTD  
8985 S. Eastern Ave., Ste. 200  
Las Vegas, NV 89123

Robert C. McBride, Esq. (NBN 7082)  
Chelsea R. Hueth, Esq. (NBN 10904)  
MCBRIDE HALL  
8329 W. Sunset Road, Suite 260  
Las Vegas, Nevada 89113

*Attorneys for Defendant*

Nicholas A. Colella (*pro hac vice*)  
LYNCH CARPENTER LLP  
1133 Penn Avenue, 5<sup>th</sup> Floor  
Pittsburgh, Pennsylvania 15222  
Telephone: (412) 322-9243  
nickc@lcllp.com

Raina C. Borrelli (*pro hac vice*)  
Brittany Resch (*pro hac vice*)  
STRAUSS BORRELLI PLLC  
980 N. Michigan Avenue, Suite 1610  
Chicago, IL 60611

1 Telephone: (872) 263-1100  
2 Facsimile: (872) 263-1109  
3 raina@straussborrelli.com  
4 bresch@straussborrelli.com

5 *Attorneys for Plaintiff Tausinga*

6 /s/ Daniel C. Tetreault  
7 Daniel C. Tetreault, Esq. (NBN 11473)  
8 Ramzy P. Ladah (NBN 11405)  
9 517 S. Third Street  
Las Vegas, NV 89101

10 *Attorneys for Plaintiff Wrenn*

11  
12 /s/ Jonathan B. Lee  
13 Jonathan B. Lee, Esq. (NBN 13524)  
14 Clark Seegmiller, Esq. (NBN 3873)  
15 801 South Fourth Street  
16 Las Vegas, NV 89101

17 *Attorneys for Plaintiff Caroline Aurora*

18 **IT IS SO ORDERED:**  
19  
20

21 \_\_\_\_\_  
22 Dated  
23  
24  
25  
26  
27  
28

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE